

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

Mary Ann Fisher	:	
and	:	CIVIL ACTION
Deborah Waters,	:	
	:	
Plaintiffs,	:	
	:	
v.	:	NO. 2:15-cv-05736
	:	
Albert Einstein Healthcare Network,	:	
	:	
Defendant.	:	

**JOINT MOTION FOR EXTENSION OF TIME**

Pursuant to Federal Rule of Civil Procedure 6(b), plaintiffs, Mary Ann Fisher and Deborah Waters (collectively “plaintiffs”), and defendant, Albert Einstein Healthcare Network, through their undersigned counsel, hereby move for a 30 day extension of time for defendant to answer or otherwise respond to plaintiff’s Complaint because the parties have begun meaningful settlement discussions.

Defendant’s response to the Complaint is currently due on February 5, 2016. In an attempt to avoid the time and expense of continuing litigation, the parties have been discussing settlement. While the parties intend to continue to engage in good faith settlement negotiations, they are unlikely to reach a settlement agreement by February 5, 2016. Consequently, the parties respectfully request that this Court grant an extension for defendant to

answer or otherwise respond to the Complaint until March 7, 2016 so that the parties have sufficient time to try to settle this action without incurring significant additional expense.

Respectfully submitted,

Respectfully submitted,

/s/ Matthew D. Miller

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*Attorneys for Defendant, Albert Einstein  
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Dated: January 28, 2016

**CERTIFICATE OF SERVICE**

I, Kali T. Wellington-James, hereby certify that on January 28, 2016 a true and correct copy of the foregoing Joint Motion for Extension of Time was served via the court's electronic filing system upon the following:

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